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8	UNITED STATES DISTRICT COURT
9	DISTRICT OF NEVADA
10	-0Oo-
11	UNITED STATES OF AMERICA,) 2:11-cr-217-LDG-CWH
12	Plaintiff,
13	v.) GOVERNMENT'S PROPOSED VOIR) VOIR DIRE QUESTIONS
14	NICHOLAS LINDSEY,
15	Defendant.
16	
17	THE UNITED STATES OF AMERICA, by and through Daniel G. Bogden, United States
18	Attorney, District of Nevada, Christina M. Brown, Assistant United States Attorney, and Brian R.
19	Young, Trial Attorney, Fraud Section, Criminal Division, Department of Justice, pursuant to
20	Federal Rule of Criminal Procedure 24(a), requests that the Court include the following questions
21	in its examination of prospective jurors. Leave is requested to orally tender supplemental
22	questions as necessitated by the answers of the prospective jurors.
23	DATED this 18th day of March, 2013.
24	Respectfully submitted,
25	DANIEL G. BOGDEN
26	United States Attorney
	/s/ Christina M. Brown Christina M. Brown Assistant United States Attorney

Knowledge of the parties and witnesses: Defendant Nicholas Lindsey worked in mortgage lending at Clear Mortgage and Signature 2 1. Mortgage. 3 Are any of you familiar with this entity? 4 a. 5 Do any of you know someone who has worked for this entity? b. 6 Experience with mortgage lenders: 7 2. Who now has or has in the past had a residential mortgage? 8 The following mortgage lenders were affected by the crimes alleged in this case: 3. 9 Decision One Mortgage a. 10 Spectrum Financial Group b. 11 Taylor Bean and Whitaker c. 12 d. **Realty Mortgage Corporation** 13 e. Security National Mortgage 14 Do or did any of these lenders hold the mortgage note on your current or former home, or to your knowledge those of your family or close friends? 15 16 4. Have any of you had a negative experience with your lender? 17 5. Has anyone here ever been denied a home loan or modification? 18 Has anyone here ever defaulted on a home loan? Was there a foreclosure? 6. 19 7. Has anyone attempted to do a home loan modification? 8. Has anyone been forced to declare bankruptcy, and if so, was the inability to maintain 20 21 mortgage payments a contributing cause? 22 9. Has anyone here been sued by a lender? 23 10. Representatives of mortgage lenders will be testifying in this case. Would anyone 24 automatically weigh the testimony of a lender's representative more or less favorably than any other witness? 25 26 11. Does anyone believe that you would hold a lender's or bank's failure to detect

misrepresentations or omissions in loan applications against the lender or bank?

Experience in mortgage, banking, real estate industry:

- 12. Does anyone work in the mortgage or banking industry? Would your experience in the mortgage or banking industry affect your ability to be fair and impartial to either party in this case?
- 13. Does anyone have a family member or close friend in the mortgage, banking, or real estate profession? If so, would that relationship affect your ability to be fair and impartial to either party in this case?

Contacts with criminal justice system:

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- 14. Has anyone been involved in a criminal case, other than minor traffic violations, either as a victim, witness, or a defendant? (If so, the Government requests the court question the potential juror regarding the circumstances at sidebar to avoid embarrassment to the potential juror.)
- 15. Does anyone have a close friend or relation who has been accused of a crime, other than minor traffic infractions?
- a. What is your relation to that person?
- 14 b. How long ago was the event?
- 15 c. What was the nature of the offense and the outcome?
- 16 d. Do you believe the person was treated fairly?
- e. Would the experience distract you from listening objectively to the evidence in this case or impact rendering a decision in this case?
- 19 General questions regarding ability to serve as a juror:
- 20 16. Do any of you have limitations with hearing, sight, or have other medical difficulties which could impair your ability to devote full attention to this trial?
- 22 | 17. Do any of you have anything in your background, or personal, philosophical, or religious 23 | beliefs which could cause you to hesitate from passing judgment on another person in the form of 24 | rendering a verdict?
- 25 18. The Court will instruct you on the law. Will you follow the law as provided by the Court, even if the law is inconsistent with or contrary to your personally held beliefs or values?

CERTIFICATION OF SERVICE This is to certify that the foregoing was served on William Carrico, Esq., counsel for the defendant, via ECF, this the 18th day of March, 2013. /s/ Christina M. Brown CHRISTINA M. BROWN Assistant U.S. Attorney